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*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

VERA A. HAYS, individually and on behalf  
of herself and all others similarly situated,

Plaintiff,

v.

AMERICAN CENTURY CAPITAL  
PORTFOLIOS, INC., AMERICAN  
CENTURY INVESTMENT SERVICES,  
INC., AMERICAN CENTURY  
INVESTMENT MANAGEMENT, INC.,  
PATRICK BANNIGAN, JONATHAN  
THOMAS, R. WES CAMPBELL, CHRIS H.  
CHEESMAN, RAJESH K. GUPTA, C. JEAN  
WADE, THOMAS W. BUNN, BARRY  
FINK, ANDREA C. HALL, JAN M. LEWIS,  
LYNN JENKINS, M. JEANNINE  
STRANDJORD, JOHN R. WHITTEN, and  
STEPHEN E. YATES,

Defendants.

Case No. 3:21-cv-08625-CRB

**PLAINTIFF'S NOTICE OF  
VOLUNTARY DISMISSAL WITHOUT  
PREJUDICE PURSUANT TO FED. R.  
CIV. P. 41(a)(1)(A)(i)**

TO THE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Plaintiff Vera A. Hays hereby dismisses, without prejudice, her claims in the above-captioned action against all named defendants. This notice is being filed with the Court before defendants have served an answer or moved for summary judgment in this action, and before a class has been certified.

Dated: January 31, 2022

**Schubert Jonckheer & Kolbe LLP**

By: /s/ Willem F. Jonckheer

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